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February 28, 2019  
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary  
Federal Communications Commission  
9050 Junction Drive  
Annapolis Junction, MD 20701

**RE: Atlanta DataCom, Inc.  
EB Docket No. 06-36; CPNI Certification for CY 2018**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Atlanta DataCom, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to [cwrightman@inteserra.com](mailto:cwrightman@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/Connie Wightman

Connie Wightman  
Consultant

tms: FCx1901

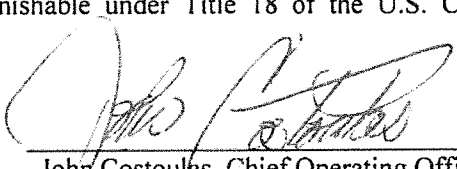
Enclosures  
CW/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification	Covering calendar year 2018
Name of company(s) covered by this certification:	Atlantic Datacom, Inc. d/b/a ADCom Solutions
Form 499 Filer ID:	830781
Name of signatory:	John Costoulas
Title of signatory:	Chief Operating Officer

1. I, John Costoulas, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
John Costoulas, Chief Operating Officer

  
\_\_\_\_\_  
Date

Summary of customer complaints (not applicable, See Statement)

**Atlantic Datacom, Inc.**  
**Statement of Customer Proprietary Network Information (CPNI)**  
**Operating Procedures and Compliance**

Atlantic Datacom, Inc. ("ADCom"), in accordance with section 64.2009(e), submits this statement summarizing how ADCom's operating procedures are designed to ensure compliance with the Commission's CPNI rules. This statement summarizes the procedures that the company has implemented to safeguard the CPNI of its customers.

**USE OF CPNI**

ADCom values its customers' privacy and takes measures to ensure that it protects CPNI. It is ADCom's policy to protect the confidentiality of its customers' information. ADCom does have CPNI, including quantity, technical configuration, type, location and use of telecommunications services provided by the Company. However, this information is only made available to customers pursuant to procedures described herein. ADCom does not use, disclose, or permit access to its customers' CPNI except as such use, disclosure, or access is permitted under Section 222 of the Communications Act of 1934, as amended, and the Commission's implementing rules.

As necessary, ADCom may use CPNI for the permissible purposes enumerated in the Act and the Commission's rules, including, but not limited to, initiating, rendering, billing, and collecting for telecommunications services. The company also may use CPNI to protect its rights or property.

ADCom does not use CPNI to market products and services to customers outside of the category of service to which the customer already subscribes. ADCom also does not share CPNI with any affiliates or third parties for marketing purposes. If, in the future, ADCom seeks to use CPNI for these purposes, then it will provide the appropriate notice to customers and will maintain a list of customer preferences. ADCom also will maintain a record of any marketing campaign in accordance with the Commission's rules.

**PROTECTION OF CPNI**

As set forth below, ADCom has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. ADCom systems are monitored to determine if and when intrusion attempts are made by outside sources or by internal personnel.

Customer requests for information must be sent in writing by the authorized party of record for the customer. ADCom responds back in writing, to the authorized customer representative at the primary address of record.

The company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to ensure that procedures are being followed. ADCom has an express disciplinary process in place for violation of the company's CPNI policies, up to and including termination of employment.

#### **DISCLOSURE OF CALL DETAIL OVER THE PHONE**

ADCom has a process in place for verifying its customers' identity during an in-bound call. ADCom does not release call detail information during an in-bound call. ADCom does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

In some instances involving a business customer with a dedicated account representative, the Company may have agreements that address authentication procedures for disclosing CPNI that differ from those described above.

#### **DISCLOSURE OF CPNI ONLINE**

ADCom does not disclose CPNI online at this time. Should it choose to do so in the future, it will institute authentication procedures to safeguard the disclosure of CPNI online.

#### **DISCLOSURE OF CPNI AT RETAIL LOCATIONS**

ADCom does not have any retail locations and therefore does not disclose CPNI in-store.

#### **ACTIONS AGAINST DATA BROKERS**

ADCom has not taken any actions against data brokers in the past year.

#### **NOTIFICATION OF LAW ENFORCEMENT**

ADCom takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. ADCom has practices and procedures in place to notify law enforcement, and customers, if permitted, of a security breach that result in the unauthorized access to, use, or disclosure of CPNI. ADCom will maintain a record of the notification in accordance with the Commission's rules.

#### **INFORMATION ABOUT PRETEXTERS**

The Company does not have any information outside of the information filed in Docket No. 96-115 or that is publicly available regarding the processes that pretexters are using to attempt to access CPNI. The Company has taken steps to protect CPNI, which are described throughout this document.

## **ANNUAL CERTIFICATION**

ADCom has designated an officer, as an agent for the company, to sign and file a CPNI compliance certificate on an annual basis.